Asbestos Information Association/North America

22 East 40th Street
New York, N. Y. 10016
212-689-3378



October 24, 1972

TO: AIA/NA Executive Committee

Gentlemen:

Attached is the first draft of a proposed AIA/NA "Employee Safety & Health Guide" on asbestos. The purpose of the Guide, which would be printed in booklet form, is to inform asbestos industry employees of the basic facts about asbestos-health and also about employer responsibilities under the OSHA regulations.

The main reasons why I am proposing such a booklet at this time are as follows:

1. The IUD is launching a program (the Mount Sinai seminar in late November is the first step) to inform employees throughout the industry of the health hazards of asbestos and how to best use OSHA to assure compliance with the standards. There is little doubt that the IUD will paint a very black picture of the health situation and of the industry's supposed lack of concern for its employees, and will encourage local unions to constantly search out even minor infractions of the regulations for reporting to OSHA, as well as to press for strict observance of all employee health rights granted under the law.

   In my opinion, it is essential that we get to our employees first with the facts about asbestos-health, and about OSHA, rather than to permit the IUD to present its highly distorted, anti-industry "information" unchallenged.

2. One of the major arguments voiced by both Tony Mazzochi and Dr. Selikoff at the Lyon conference for greater union participation in medical and other meetings on asbestos-health was that the industry was taking no active steps

000181

to inform its employees of the hazards of asbestos and was, in fact, trying to keep these facts hidden from its workers.

Thus, in principle, a booklet of this nature would have the support of the IUD and of Dr. Selikoff. It would also be an effective refutation of their charges that the industry is doing nothing to inform its employees.

3. OSHA has on more than one occasion voiced its contention that industry should provide employees with as much information as possible on occupational health hazards, and that OSHA would look favorably on any industry that did so.

In my opinion, it would be a serious error on our part to continue to hold the belief that our employees are, for the most part, unaware of the asbestos-health problem and are not going to find out about it unless we tell them. I think we must face up to the fact that employees in all areas of the asbestos industry are becoming increasingly aware of the situation and are going to become better and better informed as the IUD and other medical-labor informational programs get into full swing. The point is simple: If we don't inform our employees, somebody else will!

I am fully aware that one of the major industry fears with regard to providing employees with facts on asbestos-health is that this would result in a great increase in workman's compensation claims. While there may be some validity in this argument, think for a moment how many claims there would be if the IUD and Dr. Selikoff were permitted to present their estimate of the health situation to employees without any refutation by the industry.

One of the major problems that can be anticipated in any industry sponsored informational program for employees is the question of credibility. Will employees believe what we tell them? or will they consider the contents of the booklet to be nothing but a pack of industry lies and misinformation? Because of this credibility problem, it is essential that the booklet not be a propaganda piece, but it must be as factual and irrefutable as we can possibly make it. For this reason, for example, I have eliminated all but a passing reference to industry efforts in controlling dust levels and have instead concentrated on the industry's responsibilities to its employees under OSHA. Hopefully, the employees will come to the conclusion that if the industry is willing to tell them what the law requires, the industry is, in fact, planning to obey the law.

000182

It has also been proven that heavy asbestos exposure greatly increases the risk of lung cancer from cigarette smoking, but that asbestos industry workmen who do not smoke cigarettes have no greater risk of lung cancer than the average man-on-the-street who does not smoke.

Is My Job Hazardous?

As a general rule, most employees engaged in the mining and milling of asbestos fiber, or in the manufacturing of asbestos-containing products will be exposed to some quantity of airborne asbestos fiber in their jobs. In properly controlled plants and mines, these levels will be extremely low. In improperly or uncontrolled operations, the levels may be dangerously high. Most manufacturing plants in the industry are now or soon will be properly controlled.

The installation or application of most finished asbestos-containing products will not produce dust levels high enough to be of concern. In products such as vinyl-asbestos floor tile and asbestos-cement sheets and pipe, the asbestos is solidly locked into the product with cement, plastic or other binders in such a manner that the fiber is not easily released during normal handling and application.

Some asbestos-containing products, however, such as unsaturated textiles and most asbestos insulations, can release potentially hazardous amounts of asbestos during handling or fabrication. The tear-out or removal of old asbestos-containing insulations can likewise be a very dusty operation. These products must, therefore, be handled with caution using approved methods of dust suppression and control to minimize the generation of airborne fiber. Fortunately, only a very small percentage of the asbestos-containing products produced in the United States each year are capable of releasing sizeable quantities of dust during handling or application.

000185

If you are unsure whether the product you are using is capable of producing potentially hazardous amounts of asbestos dust, check the carton or bag in which the product was shipped. Manufacturers are required by law to place a caution label on all asbestos-containing products that readily release high levels of fiber during handling or application. The label has been placed there for your protection. Look for it if you are unsure.

If you do not work directly with asbestos or asbestos-containing products, but work in close proximity to those who do, such as on a construction site where asbestos-containing insulations are being applied, you should check to determine if these products are being handled properly. If they are, it is highly unlikely that you will be exposed to potentially unsafe levels of asbestos. If proper precautions are not being taken by other workmen on the job site, this should be reported to your employer or union representative.

Regulations On Asbestos

On June 7, 1972, the Occupational Safety and Health Administration (OSHA) of the United States Department of Labor issued occupational standards for exposure to asbestos dust. These standards have one major purpose -- to protect you from exposure to potentially hazardous amounts of asbestos dust in your work. The asbestos standards, as they are commonly called, contain many detailed requirements, however, the basic obligations placed on the employer under the standards can be summed up as follows:

1. The employer shall maintain a healthy workplace by making sure that no employee is exposed to concentrations of airborne asbestos fiber in excess of established limits.*

000186

* The current OSHA limit for exposure to asbestos is 5 fibers, five microns in length or longer, per cubic centimeter (cc) of air as averaged over an 8-hour workday. At no time may an employee's exposure exceed 10 fibers per cc. In 1976, the 8-hour average is scheduled to be reduced to two fibers per cc. A micron is approximately 1/25,000th of an inch, and a cubic centimeter is approximately

10. Caution labels shall be placed on asbestos-containing products that are likely to release free asbestos fiber in excess of the standard during handling, application or fabrication.
11. The employer shall provide yearly medical examinations for employees exposed to concentrations of asbestos dust. Pre-employment and termination medical exams are also required.
12. At his request, an employee's medical records can be made available to his family physician.

While the entire set of asbestos regulations covers nearly 4½ large pages of fine print, the Twelve Key Points listed above are the most important as far as you, the employee, is concerned. Standing behind the working man, ready to enforce these regulations, is the Occupational Safety and Health Administration, with inspectors and offices all across the country. If the standards are not being met, any employee has the right to complain to OSHA and request a government inspection team to investigate the situation. Employers who fail to obey the regulations are subject to heavy fines. It is in your best interest to know your rights under the law and what obligations your employer has toward you. The Twelve Key Points listed above should help.

What Can I Do?

Industrial safety and health can never be only one person's responsibility. Both employer and employee must work together to provide a safe and healthy working environment. In certain segments of the construction industry, for example, very detailed work practices will have to be instituted to assure compliance with the regulations. As an employee, it will be your duty to follow these work practices at all times, and not take short cuts that may endanger your own health and that of other workmen on the job as well as possibly subject your employer

000188

to an unnecessary fine. For another example, if you see a potential hazard that your employer may have overlooked, point it out to him for correction. Only if he continuously ignores obviously hazardous situations or refuses to correct them should you report the violation to OSHA. Remember, compliance with the regulations will be extremely difficult and very expensive in many segments of the industry. In the interest of saving jobs as well as assuring a healthy workplace, industry and labor must work together to solve their mutual problems.

Asbestos and Smoking

On page 2 of this booklet, it was pointed out that smoking cigarettes greatly increases the risk of lung cancer among employees exposed to excessive quantities of asbestos dust. Statistics show that long term, heavily exposed asbestos insulation workers who smoke cigarettes have a 92 times greater risk of developing lung cancer than their fellow workers who do not smoke. In fact, if you do not smoke cigarettes, even if you have been exposed to excessive concentrations of asbestos dust for 20 or more years, you have no greater chance of getting lung cancer than the average man-on-the-street who does not smoke.

The advice of medical specialists on this matter is simple: If you work with asbestos and smoke cigarettes, quit! If you work with asbestos and do not smoke, don't start.

000189

Summary

Asbestos can be a hazardous substance if inhaled in sufficient quantities. There is a recognized need to keep dust levels as low as possible for exposed workers. The asbestos industry is working hard to achieve control. The vast majority of finished asbestos-containing products are not hazardous to use or handle. The Occupational Safety and Health Administration has issued regulations to protect